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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TITAN INTERNATIONAL
TECHNOLOGIES, LTD.,

Plaintiff,

v.

COBRA FIRING SYSTEMS, LLC and
PHANTOM FIREWORKS OF PAHRUMP,

Defendants.

Case No.: 2:24-cv-861

**STIPULATION AND ORDER
EXTENDING TIME TO RESPOND TO
COMPLAINT**

[SECOND REQUEST]

Plaintiff Titan International Technologies, LTD. (“Titan”), by and through its counsel of record, and Defendants COBRA Firing Systems, LLC (“Cobra”) and Phantom Fireworks of Pahrump (“Phantom”) (collectively “Defendants”), by and through their counsel of record, pursuant to Local Rules IA 6-1, LR IA 6-2, and LR 7-1, hereby stipulate to extend the time to respond to Titan’s Complaint (ECF No. 1) by thirty (30) days, through and including **August 14, 2024**.

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1 The parties have been having substantive discussions regarding resolution and would like
2 to continue engaging in such discussions before moving forward with a response to the Complaint
3 and the deadlines that follow. This request is not for purposes of delay.

4 DATED this 27th day of June, 2024.

DATED this 27th day of June, 2024.

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6 By: /s/ Dustun H. Holmes
7 Dustun H. Holmes, Bar #12776
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By: /s/ Ajit Vaidya, Esq.
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11 10524 West Pico Boulevard, Suite 214
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12 Attorneys for Plaintiff

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14 IT IS SO ORDERED:

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17 UNITED STATES MAGISTRATE JUDGE

18 DATED: 6/28/2024
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